

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GRIFOLS, S.A. and GRIFOLS SHARED
SERVICES NORTH AMERICA, INC.,

Plaintiffs,

v.

DANIEL YU, an individual, GOTHAM CITY
RESEARCH LLC, GENERAL INDUSTRIAL
PARTNERS LLP, CYRUS DE WECK, an
individual, JOHN DOES 1-10, and XYZ
CORPORATIONS 1-10,

Defendants.

No.: 1:24-cv-00576-LJL

**STIPULATION AND ORDER
CONCERNING SERVICE OF
PROCESS AND BRIEFING
SCHEDULE ON POTENTIAL
RESPONSIVE MOTION**

Plaintiffs Grifols, S.A. and Grifols Shared Services North America, Inc. (collectively, “Grifols”) and Defendants Daniel Yu, Gotham City Research, LLC, General Industrial Partners, LLP, and Cyrus De Weck (collectively, Defendants) (together, the “Parties), through their undersigned counsel, hereby stipulate and agree, subject to the approval of the Court, to the following:

WHEREAS, on January 26, 2024, Grifols filed a Complaint against Defendants (ECF No. 1);

WHEREAS, on February 16, 2024, pursuant to Fed. R. Civ. P. 4(d), *et seq.*, Defendants requested Defendants waive service of the Complaint and Summonses (the “Waivers of Service”);

WHEREAS, after receipt of the Waivers of Service, counsel for Defendants contacted counsel for Grifols and indicated a willingness to accept service of the Complaint and Summonses on behalf of Defendants in exchange for agreement on a coordinated deadline for Defendants to file an anticipated responsive motion to Grifols’ Complaint; and

WHEREAS, in the interest of cooperation and conservation of judicial and party resources, Grifols agreed to Plaintiffs' proposal; and

WHEREAS, no previous extensions to any responsive deadlines have been requested as no previous responsive deadlines have been set;

IT IS THEREFORE, HEREBY STIPULATED AND AGREED by and between the Parties, that:

1. Counsel for Defendants accepts service of the Complaint and Summonses on behalf of Defendants and the Complaint and Summonses shall be deemed served on Defendants as of April 5, 2024;

2. The deadline for Defendants to answer and/or file any responsive motion to Grifols' Complaint shall be July 8, 2024;

3. The deadline for Grifols to file any opposition to any responsive motion filed by Defendants shall be August 22, 2024;

4. The deadline for Defendants to file any reply in support of any responsive motion filed by Defendants shall be September 13, 2024.

5. The Parties shall serve any of the aforementioned briefing on one another on or before the aforementioned deadlines;

6. The Parties shall not file any of the aforementioned briefing with the Court until September 13, 2024 unless the court rules provide otherwise.

IT IS SO STIPULATED.

Dated: April 10, 2024

Respectfully submitted,

PROSKAUER ROSE LLP

/s/ Peter Doyle

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**MILLER KORZENIK
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*Counsel for Defendants
Daniel Yu, Gotham City
Research LLC, General
Industrial Partners, LLP and
Cyrus de Weck.*

DATED: April 11, 2024

SO ORDERED:



Hon. Lewis J. Liman, U.S.D.J.